

Exhibit B

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION</p> <p>GOLDEN BETHUNE-HILL, et) al.,)) Plaintiffs,)) V.) Civil Action No.) 3:14-cv-852-REP-GBL-BMK) VIRGINIA STATE BOARD OF) ELECTIONS, et al.,)) Defendants.)) and)) VIRGINIA HOUSE OF) DELEGATES, et al.,)) Intervenor-Defendants.)</p> <p style="text-align: center;">VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF CHRIS JONES TAKEN ON BEHALF OF THE PLAINTIFFS Norfolk, Virginia August 23, 2017</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">I N D E X</p> <p>1 2 3 DEPONENT PAGE 4 CHRIS JONES 5 Examination by Mr. Hamilton 6 6 7 8 9 10 E X H I B I T S 11 NO. DESCRIPTION PAGE 12 1 Maps 5 13 2 House Committee on Privileges and 24 14 Elections, House Delegate District 15 Criteria 16 17 18 19 20 21 22</p>
<p style="text-align: right;">Page 2</p> <p>1 Appearances: 2 3 PERKINS COIE 4 By: KEVIN HAMILTON, ESQUIRE 1202 Third Avenue Suite 4900 5 Seattle, WA 98101 khamilton@perkinscoie.com 6 -and- PERKINS COIE 7 By: ARIA C. BRANCH, ESQUIRE 700 13th Street, NW 8 Suite 600 Washington, DC 20005 9 abranh@perkinscoie.com Counsel for the Plaintiffs 10 11 BAKER HOSTETLER 12 By: E. MARK BRADEN, ESQUIRE By: STEPHANIE MALASKA, ESQUIRE 13 1050 Connecticut Avenue, NW Suite 1100 14 Washington, D.C. 20036-5403 mbraden@bakerlaw.com 15 smalaska@bakerlaw.com Counsel for the Defendants 16 17 18 Also Present: Roque King, Videographer 19 20 21 22</p>	<p style="text-align: right;">Page 4</p> <p>1 Videotaped deposition upon oral 2 examination of CHRIS JONES, taken on behalf of the 3 Plaintiffs, before Kerry E. Zahn, Registered Merit 4 Reporter, a Notary Public for the Commonwealth of 5 Virginia at large, taken pursuant to notice, commencing 6 at 9:05 a.m., on August 23, 2017, at Zahn Court 7 Reporting, 208 East Plume Street, Suite 214, Norfolk, 8 Virginia; and this in accordance with the Federal Rules 9 of Civil Procedure. 10 09:05:57 11 THE VIDEOGRAPHER: We are now on the 09:05:57 12 video record. Here begins tape number one in the 09:06:00 13 videotaped deposition of Chris Jones in the matter of 09:06:03 14 Golden Bethune-Hill, et al., versus State Board of 09:06:06 15 Elections, et al., and Virginia House of Delegates, et 09:06:11 16 al., pending in the United States District Court for 09:06:13 17 the Eastern District of Virginia, Richmond Division, 09:06:16 18 case number 3:14-cv-852-REP-GBL-BMK. 09:06:26 19 Today's date is August 23rd, and the time 09:06:28 20 on the video monitor is 9:06 a.m. 09:06:31 21 The videographer today is Roque King, 09:06:32 22 representing Planet Depos.</p>

Page 5			Page 7		
09:06:34	1	This video deposition is being taken	09:08:02	1	A I'm thinking a couple hours. Maybe two
09:06:36	2	place at 208 East Plume Street, Norfolk, Virginia.	09:08:04	2	or three hours.
09:06:40	3	23510.	09:08:04	3	Q Was that here in Norfolk?
09:06:41	4	Will counsel please introduce themselves	09:08:06	4	A No, sir, it was in Richmond.
09:06:43	5	for the record and state whom they represent.	09:08:12	5	Q Okay. Any other depositions other than
09:06:45	6	MR. HAMILTON: Sure.	09:08:13	6	that?
09:06:46	7	Kevin Hamilton and Aria Branch from	09:08:14	7	A Not to my knowledge, other than the ones
09:06:49	8	Perkins Coie for the Plaintiffs.	09:08:16	8	we talked about before.
09:06:51	9	MR. BRADEN: And Mark Braden for the	09:08:17	9	Q Right, right. I meant -- I meant since
09:06:54	10	Defendant Interveners.	09:08:18	10	the time you and I --
09:06:56	11	MS. MALASKA: And Stephanie Malaska for	09:08:19	11	A No, no, just that one. Just that one.
09:06:58	12	the same.	09:08:22	12	Q Your last deposition was on May 6, 2015?
09:07:00	13	THE VIDEOGRAPHER: The court reporter	09:08:24	13	A That's correct.
09:07:01	14	today is Kerry Zahn, representing Planet Depos.	09:08:25	14	Q What did you do to prepare for today's
09:07:04	15	Please swear in the witness.	09:08:27	15	deposition?
09:07:13	16		09:08:28	16	A I read my last deposition. I read the
09:07:13	17	CHRIS JONES was sworn and testified on	09:08:32	17	testimony from the trial -- my testimony, that was
09:07:13	18	behalf of the Plaintiffs as follows:	09:08:35	18	all -- and then I looked at the judge's order.
	19		09:08:41	19	Not "order." I'm not an attorney, so my
	20	(Maps marked as Jones Exhibit Number 1)	09:08:44	20	apologies.
09:07:14	21		09:08:45	21	Q No, no, that's fine.
09:07:14	22		09:08:46	22	A Just the district-by-district analysis
Page 6			Page 8		
	1	EXAMINATION	09:08:48	1	from Judge Payne.
09:07:14	2	BY MR. HAMILTON:	09:08:49	2	Q Okay. Anything else?
09:07:14	3	Q Good morning, Mr. Jones.	09:08:50	3	A No, sir.
09:07:16	4	A Good morning.	09:08:50	4	Q Did you read the Supreme Court opinion?
09:07:17	5	Q We've introduced ourselves off the	09:08:52	5	A No.
09:07:18	6	record, and of course we've been together before.	09:08:54	6	Q Did you meet with any of your lawyers?
09:07:21	7	A Yes, sir.	09:08:55	7	A Yes. We met yesterday for maybe an hour
09:07:22	8	Q I represent the plaintiffs in this case,	09:08:58	8	or so.
09:07:24	9	and I'm going to be asking you a few questions.	09:08:59	9	Q Who did you meet with?
09:07:27	10	I know I deposed you once before, and we	09:09:00	10	A Stephanie and with Mark.
09:07:30	11	already asked you about prior depositions.	09:09:02	11	Q The same lawyers here in the Court -- in
09:07:33	12	Have you been deposed at any point since	09:09:05	12	the conference room today?
09:07:35	13	the last time I deposed you?	09:09:06	13	A Yes, sir.
09:07:37	14	A Yes. I believe it was sometime last year	09:09:07	14	Q Anyone else in that prep session?
09:07:40	15	on the Vesilind case, which was a state compactness and	09:09:11	15	A No.
09:07:46	16	contiguity case that went before the Richmond Circuit	09:09:11	16	Q And did you review any documents during
09:07:49	17	Court.	09:09:13	17	that prep session?
09:07:52	18	Q And do you recall who took your	09:09:14	18	A No.
09:07:54	19	deposition?	09:09:22	19	Oh. Kate did call in when we were
09:07:55	20	A Wyatt Durette. And I do not remember	09:09:25	20	talking. So Kate McKnight did phone in, not to discuss
09:07:57	21	the other individual who was in attendance that day.	09:09:30	21	my preparation, but just to talk with Mark and
09:08:00	22	Q How long did that deposition last?	09:09:33	22	Stephanie about something unrelated to, to my

Page 321			Page 323		
03:34:46	1	A It has been.	03:36:23	1	that's, that was my whole reason for it.
03:34:46	2	Q So just to be clear, the answers to your	03:36:25	2	I was a patron of the bill; I knew that I
03:34:49	3	questions with respect to this long list is, any	03:36:27	3	was going to be, quote unquote, potentially called as a
03:34:51	4	conversations at any point about the redistricting	03:36:31	4	witness and all of the above. But I think I have an
03:34:54	5	process, and you've testified about conversations with	03:36:33	5	obligation to my colleagues to let them know, full
03:34:56	6	Ingram, Knight and Loupassi, and don't recall any	03:36:35	6	disclosure, what it means to talk about any of the
03:34:59	7	specific conversations with anyone of the rest of these	03:36:37	7	above once something is in litigation.
03:35:01	8	at any point about redistricting?	03:36:40	8	Q You indicated earlier today -- I'm just
03:35:06	9	A And that was in developing the map, when	03:36:43	9	going to switch gears on you here.
03:35:07	10	it was introduced, after it was introduced, and at	03:36:44	10	You mentioned a report by James Loewen
03:35:10	11	passage.	03:36:50	11	prepared in connection with the 2001 redistricting
03:35:11	12	Q Right.	03:36:54	12	effort.
03:35:11	13	A It's confined to that; correct?	03:36:54	13	Do you recall that testimony?
03:35:13	14	Q Correct.	03:36:57	14	A I believe I only said -- are you talking
03:35:13	15	A Yes, then I believe I've answered all the	03:36:59	15	today or before?
03:35:17	16	questions properly.	03:37:01	16	Q Yeah, today.
03:35:18	17	Q Okay. So now, now let's go beyond that.	03:37:02	17	A That, that was my only recollection of
03:35:21	18	A Okay.	03:37:03	18	any polarized voting that was -- that I was aware of.
03:35:21	19	Q In the time period after final passage,	03:37:06	19	Q Did you actually review his report during
03:35:22	20	all the way up to yesterday or today, have you had any	03:37:09	20	the 2011 redistricting process?
03:35:26	21	other conversations with any of these people about the	03:37:11	21	A I did not. I relied on the attorneys.
03:35:28	22	redistricting process or the litigation?	03:37:15	22	Q Did you ever discuss his report with
Page 322			Page 324		
03:35:30	1	A No. I think I made it clear to them when	03:37:17	1	anyone during the 2011 redistricting process?
03:35:34	2	the lawsuit was filed that if they wanted to come talk	03:37:20	2	A Not to my knowledge. I just relied on my
03:35:38	3	to me, that I would not talk with them; and that they	03:37:22	3	attorneys.
03:35:40	4	were willing to put something into writing, they could;	03:37:23	4	Q Did you ever discuss the report on the
03:35:43	5	they would be deposed, I'm certain; but that I would	03:37:25	5	legislative record or on the floor of the legislature?
03:35:46	6	not be responding to any questions or talking to them	03:37:28	6	A I don't recall. I can -- my memory can
03:35:49	7	about anything dealing with the redistricting process,	03:37:31	7	be refreshed, but I've said a whole lot of things over
03:35:52	8	period. So --	03:37:34	8	the last 15 years --
03:35:53	9	Q And why did you say that?	03:37:36	9	Q Right.
03:35:54	10	A Because. Why wouldn't I say that when	03:37:36	10	A -- and sometimes '01 and '11 can become
03:35:56	11	there's a lawsuit been filed? I mean, I'm not stupid.	03:37:40	11	the same because they are similar in --
03:36:00	12	Q Well, what's wrong with having	03:37:41	12	Q Is it -- is it fair to say it's -- it
03:36:02	13	conversations with people?	03:37:44	13	wasn't part of your -- the basis or the record upon
03:36:02	14	A Because there's no need to put anybody in	03:37:50	14	which you were drawing the districts in 2011?
03:36:05	15	harm's way, because, you know, what did he say, what	03:37:55	15	A No. I would think -- I would say that
03:36:08	16	did she say?	03:37:56	16	with the attorneys, you know, being involved, being
03:36:09	17	Q Is it fair to say you don't want to have	03:38:02	17	keenly aware of that and not wanting to violate section
03:36:11	18	conversations that might be the subject of discovery	03:38:04	18	5 of the Voting Rights Act, I'm certain it's something
03:36:13	19	during the litigation?	03:38:08	19	that they contemplated.
03:36:14	20	A No. I just don't want to put someone in	03:38:08	20	Q But not you?
03:36:17	21	a very casual way, them have to be brought into	03:38:09	21	A But not me. I, I did -- that was not
03:36:22	22	something they don't need to be brought into. That,	03:38:10	22	something that I've -- I felt like I, I relied on them

Page 325		Page 327	
03:38:15	1 and their advice.	03:39:43	1 A I guess to the caucus, yeah, he would.
03:38:16	2 Q You didn't even read it?	03:39:43	2 Like a GOPAC maybe. I really don't have a clue.
03:38:17	3 A No.	03:39:47	3 Q And was he involved in the 2001
03:38:18	4 Q You didn't have a copy of it?	03:39:50	4 redistricting process?
03:38:19	5 A No. No. And I know I might sound a	03:39:52	5 A He was.
03:38:22	6 little odd, but I rely on people to do a job you hire	03:39:52	6 Q And what was his role there?
03:38:25	7 them to do.	03:39:53	7 A Similar to what it was in 2011.
03:38:26	8 Q And you didn't make any redistricting	03:39:55	8 Q And what was that?
03:38:28	9 decisions in 2011 based on that report because you	03:39:56	9 A Just as a consultant, to look at the
03:38:31	10 didn't even read it?	03:40:02	10 political data.
03:38:33	11 A Not that I would be aware of, but I'm	03:40:04	11 Q From your testimony in this deposition,
03:38:37	12 certain we were not -- if I was not following what the	03:40:06	12 it sounds like he did more than just look at political
03:38:40	13 report said, I would have been informed by the	03:40:09	13 data. He actually helped draw some of the lines.
03:38:42	14 attorneys that we had on --	03:40:12	14 A He did, yes. He had the technical
03:38:44	15 Q Well, the report didn't say anything	03:40:14	15 expertise to do that.
03:38:45	16 about --	03:40:16	16 Q Where were the maps -- was the data in
03:38:46	17 A No.	03:40:17	17 the maps stored at, actually, physically, on computers?
03:38:47	18 Q -- the conditions on the ground in	03:40:20	18 A That was on a computer that was in my
03:38:48	19 Virginia ten years later, 2011, did it?	03:40:21	19 office, I believe.
03:38:53	20 A I don't -- I believe it spoke to the	03:40:22	20 Q And, so, Mr. Morgan came into your office
03:38:55	21 existence -- the existence of racial polarized voting	03:40:24	21 to do the work there? Or did he have a copy in his
03:38:59	22 in Virginia, I think.	03:40:27	22 office?
Page 326		Page 328	
03:39:00	1 Q In 2001?	03:40:31	1 A I can't speak to that, I don't know.
03:39:02	2 A But that's in Virginia.	03:40:32	2 Q You don't know?
03:39:03	3 Q In Virginia in 2001. That's what the	03:40:33	3 A I don't know.
03:39:06	4 report was discussing?	03:40:33	4 Q Did he spend a lot of time in your
03:39:07	5 A Right.	03:40:36	5 office?
03:39:07	6 Q Not the conditions and the existence or	03:40:36	6 A When we were -- when we were doing the
03:39:10	7 absence of polarized voting in 2011?	03:40:38	7 redistricting, yes, he was in my office. I mean, when
03:39:14	8 A I would say that's probably true, yes.	03:40:39	8 you -- you get, you get geared up and you go, and it's
03:39:16	9 Q Okay. You also mentioned John Morgan.	03:40:42	9 a very time-intensive, 15-hour, 16-hour day process for
03:39:19	10 Who is John Morgan?	03:40:46	10 about a six week period.
03:39:20	11 A John Morgan is a consultant.	03:40:49	11 Q Would he sometimes be sitting at the
03:39:22	12 Q When did you first learn of him or hear	03:40:52	12 computer working on the maps when you weren't there?
03:39:25	13 of him?	03:41:00	13 A Yes, I would assume, yeah.
03:39:25	14 A In 1997, 20 years ago probably this	03:41:01	14 Q And then you'd come in and he would show
03:39:30	15 month.	03:41:03	15 you what he did?
03:39:30	16 Q And in what connection?	03:41:04	16 A Yeah, he would make tweaks, I guess, to
03:39:32	17 A When the caucus insisted that they give	03:41:06	17 the -- on the edges.
03:39:35	18 me some kind of support when I was running for	03:41:07	18 Q Who hired him?
03:39:37	19 reelection, to give in-kind services as to what I	03:41:08	19 A I believe he was hired by the Speaker.
03:39:40	20 needed to do to win my district.	03:41:11	20 Q By the -- and was he paid for -- or did
03:39:42	21 Q And he was a political consultant at the	03:41:14	21 the Commonwealth pay for that or did the Republican
03:39:43	22 time?	03:41:16	22 caucus pay for that?